

September 24, 2013

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Rural Health Care Support Mechanism* – WC Docket No. 02-60  
Notice of Ex Parte Communication

Dear Ms. Dortch:

On Friday, September 20, 2013, Colin Underwood of Alaska Communications Systems (“ACS”), Debra Morse of ACS, and I met with Linda Oliver and Chistianna Lewis Barnhart of the Wireline Competition Bureau concerning the above-captioned proceeding. The attached materials were distributed at the meeting, and summarize the substance of our discussion.

ACS described the importance of the Rural Health Care support program to rural Alaska and noted that the state recently received a grant under the Veterans Rural Tele-health Project. ACS discussed the importance to Alaska tele-health projects of continued access to discounted telecommunications connectivity *and* access to new equipment and services through the Health Care Connect Fund.

ACS also explained that many areas of Alaska are dependent on very costly satellite middle-mile connectivity. While terrestrial-based alternatives may be preferable for performance and reliability, they simply are not available in all parts of Alaska. Moreover, where terrestrial alternatives are available, they are not always offered at competitive rates. For example, in southwest Alaska, the Terra Southwest project received substantial federal funding, yet capacity is not made available to unaffiliated providers such as ACS on non-discriminatory terms; and to the extent it is offered, the wholesale price is *higher* than the price of satellite connectivity. In order to limit the burden on RHC support mechanisms, ACS suggests that the Commission consider amending Section 54.609(d)(1) of its rules to cap support at the *lower of a cost-based* terrestrial rate or the prevailing satellite rate.

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Please direct any questions concerning this matter to me.

Very truly yours,

/s/  
Karen Brinkmann  
*Counsel for ACS*

Attachments

cc: Linda Oliver  
Chistianna Lewis Barnhart